



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH
F. #2019R00927

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 18, 2020

By ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna,
Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

The government respectfully submits, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, a stipulated protective order that limits the disclosure of certain sensitive material in the above-referenced case. Due to the nature of the conduct at issue in this matter, unrestricted disclosure of certain information could create a safety risk for potential witnesses. Accordingly, the government and counsel for the defendant have jointly agreed to a stipulated protective order, which is attached hereto.

For the foregoing reasons, the government respectfully requests that the Court so-order the attached stipulated protective order.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Ryan C. Harris
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